



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

SEP 25 0908

Reply to
Attn Of: AWT-107

Sarah Rees, Manager
Air Quality Program
Program Development Section
Washington State Dept. of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Rees:

The purpose of this letter is to confirm the agreement between Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) on implementation of the federal Prevention of Significant Deterioration (PSD) permitting program under the February 23, 2005 PSD Delegation Agreement with respect to recent changes to the federal PSD regulations.

On July 15, 2008, a number of changes to the federal PSD regulations (40 CFR 52.21) became effective. These changes revised the federal PSD regulations to make them applicable to the new PM_{2.5} National Ambient Air Quality Standards and codified the EPA Administrator's determination that, for purposes of 40 CFR 52.21, sulfur oxides (SO_x) and nitrogen oxides (NO_x) are considered precursors to PM_{2.5}, thereby subjecting sources of SO_x and NO_x to PSD for PM_{2.5}.

Under Section VIII of the PSD Delegation Agreement, the implementation and enforcement of new or revised EPA PSD regulations remains the sole responsibility of EPA until a new delegation agreement is signed. In this instance, EPA retains the responsibility for new or modified major stationary sources that are subject to PSD review for direct PM_{2.5} emissions or any PM_{2.5} precursor to ensure that the PM_{2.5} standards are attained and maintained. Therefore, until a new delegation agreement is signed, it is agreed that EPA will co-sign all PSD permits for sources that are subject to PSD review for PM_{2.5}.

In order to facilitate the process of EPA co-signature during this interim period, I strongly encourage your staff to work early and often with the EPA staff who will be responsible for the PM_{2.5} portion of the permit. The primary staff are Pat Nair (PSD permit lead), and Herman Wong (ambient impact analyses).

If you have any questions on the PSD delegation or the process for implementing the PSD program during this interim period, please give me a call at (206) 553-6908.

Sincerely,

Nancy Helm, Manager
Federal and Delegated Air Programs Unit